

**WEIL, GOTSHAL & MANGES LLP**

Theodore E. Tsekerides (*pro hac vice*)  
(theodore.tsekerides@weil.com)

Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)

Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)

767 Fifth Avenue  
New York, NY 10153-0119

Tel: (212) 310-8000

Fax: (212) 310-8007

**KELLER BENVENUTTI KIM LLP**

Tobias S. Keller (#151445)  
(tkeller@kbbkllp.com)

Jane Kim (#298192)  
(jkim@kbbkllp.com)

David A. Taylor (#247433)  
(dtaylor@kbbkllp.com)

650 California Street, Suite 1900  
San Francisco, CA 94108

Tel: (415) 496-6723

Fax: (650) 636 9251

*Attorneys for Debtors and Reorganized  
Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**STIPULATION BY AND BETWEEN  
REORGANIZED DEBTORS AND  
ANGELA RAMIREZ**

1 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the  
2 “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” and as reorganized  
3 pursuant to the Plan,<sup>1</sup> the “**Reorganized Debtors**”) in the above-captioned cases (the “**Chapter**  
4 **11 Cases**”) and Angela Ramirez (“**Ramirez**,” and together with the Reorganized Debtors, the  
5 “**Parties**”), by and through their respective counsel, hereby submit this stipulation (the  
6 “**Stipulation**”) for an order clarifying that the Plan Injunction (as defined below) does not preclude  
7 Ramirez from prosecuting a pending lawsuit to liquidate her claims against the Utility. The Parties  
8 hereby stipulate and agree as follows:

9 **RECITALS**

10 A. On January 29, 2019 (the “**Petition Date**”), the Debtors commenced these Chapter  
11 11 Cases in the United States Bankruptcy Court for the Northern District of California (the  
12 “**Bankruptcy Court**”).

13 B. On May 23, 2019, Ramirez filed in the Superior Court of California, County of  
14 Sacramento (the “**State Court**”) a complaint (the “**Complaint**”) in which she asserted  
15 employment-related claims against the Utility. The action initiated by the Complaint is currently  
16 pending in the State Court, and is titled *Ramirez v. Pacific Gas & Electric Company*, Case No. 34-  
17 2019-00255681 (the “**State Court Action**”).

18 C. On August 23, 2019, Ramirez filed Proof of Claim No. 7930 (the “**Proof of**  
19 **Claim**”), on account of the claims asserted in the Complaint.

20 D. By Order dated June 20, 2020 [Dkt. No. 8053] (the “**Confirmation Order**”), the  
21 Bankruptcy Court confirmed the Plan. The Effective Date of the Plan occurred on July 1, 2020.  
22 *See* Dkt. No. 8252.

23 E. Sections 10.5 and 10.6 of the Plan and Paragraphs 51 and 52 of the Confirmation  
24 Order establish the “**Plan Injunction**,” which supersedes the automatic stay in most respects and  
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26 <sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in  
27 the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June*  
28 *19, 2020* (as may be further modified, amended or supplemented from time to time, and together  
with any exhibits or schedules thereto, the “**Plan**”).

1 expressly prohibits (1) commencing, conducting, or continuing in any manner, directly or indirectly,  
2 any suit, action, or other proceeding of any kind with respect to any pre-petition claims against the  
3 Debtors or Reorganized Debtors, and (2) any effort to enforce, collect or recover on any judgment  
4 based on any pre-petition claims.

5 F. On February 16, 2022, Ramirez filed a *Motion for Relief from Automatic Stay* [Dkt.  
6 No. 11936] (the “**Motion**”).

7 G. Ramirez acknowledges that all of the claims asserted in the Complaint and the Proof  
8 of Claim are based on alleged acts or omissions that occurred after the Petition Date, and that no  
9 claims based on pre-petition conduct will be litigated.

10 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
11 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
12 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**  
13 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT**  
14 **TO ORDER, THAT:**

15 1. The Motion is deemed withdrawn.

16 2. Upon Ramirez’s filing of an amended complaint in the State Court Action that  
17 affirms that Ramirez’s allegations in the State Court Action are limited to alleged acts or omissions  
18 that occurred after the Petition Date:

19 a. the Plan Injunction does not preclude Ramirez from prosecuting the State  
20 Court Action against the Utility; and

21 b. the Proof of Claim is disallowed and expunged in its entirety.

22 3. In the event that the terms of this Stipulation are not approved by the Bankruptcy  
23 Court, it shall be null and void and have no force or effect, and the Parties agree that, in such  
24 circumstances, this Stipulation (including statements in the Recitals) shall be of no evidentiary value  
25 whatsoever in any proceedings.

26 4. This Stipulation shall be binding on the Parties and each of their successors in  
27 interest.

28 5. This Stipulation shall constitute the entire agreement and understanding of the Parties  
relating to the subject matter hereof and supersedes all prior agreements and understandings relating  
to the subject matter hereof.

1           6.       This Stipulation may be executed in counterparts, each of which shall be deemed an  
2 original but all of which together shall constitute one and the same agreement.

3           7.       The Bankruptcy Court shall retain jurisdiction to resolve any disputes or  
4 controversies arising from this Stipulation or any Order approving the terms of this Stipulation.  
5

6           Dated: March 28, 2022

Dated: March 28, 2022

7           KELLER BENVENUTTI KIM LLP

FORTHRIGHT LAW, P.C.

8           /s/ David A. Taylor

/s/ Dow W. Patten

9           David A. Taylor

Dow W. Patten

10          *Attorneys for Debtors*  
11          *and Reorganized Debtors*

*Attorneys for Angela Ramirez*